

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

EDIFECS, INC., a Washington corporation,
Plaintiff,
v.
WELLTOK, INC., a Colorado corporation,
Defendant.

Case No. 2:18-cv-01086-JLR

**STIPULATED MOTION AND ORDER
RE: DEPOSITION SCHEDULING**

**NOTE ON MOTION CALENDER:
September 20, 2019**

WHEREAS the fact discovery deadline in this case is September 30, 2019 (Dkt. 17);

WHEREAS counsel for the parties are working together to complete depositions of party and third-party witnesses resident in various locations throughout the United States and abroad;

WHEREAS many of the deponents in this case have sales roles that require significant travel and create logistical difficulties in scheduling depositions;

WHEREAS to minimize disruption to the parties' and deponents' respective business operations and to attempt to reduce travel costs and inconvenience to party and third-party witnesses, the parties seek leave to conduct depositions during the first two weeks in October 2019 where needed to accommodate witness schedules;

WHEREAS the parties have not sought any other modifications to the Court's scheduling order, and permitting depositions to occur through October 11, 2019 will not

2:18-cv-01086-JLR

1 impact the trial schedule or any other case management deadlines;

2 WHEREAS the parties respectfully submit that there is good cause to permit
3 depositions to occur through October 11, 2019 in order to reduce overall litigation costs,
4 achieve the prompt completion the case, to minimize the costs of discovery, and to allow
5 counsel to creatively and cooperatively manage deposition scheduling on a cost-effective basis
6 (*see* Introduction to W.D. Wash. Local Civil Rules),

7 NOW THEREFORE, the parties respectfully authorization to allow depositions to
8 occur in this matter until October 11, 2019.

9 Dated: 9/20/2019

ORRICK, HERRINGTON & SUTCLIFFE LLP
ARAVIND SWAMINATHAN
ROBERT L. URIARTE
NICOLE M. TADANO

JAMES POOLEY LAW OFFICE PLC
JAMES A. POOLEY

14
15 By: /s/ Aravind Swaminathan
Aravind Swaminathan

16 Attorneys for Plaintiff, EDIFECS, INC.

17
18 Dated: September 23, 2019

BETTS, PATTERSON & MINES, P.S.

19
20 By: /s/ Anne Cohen
Anne Cohen

21 Attorneys for Defendant, WELLTOK, INC.

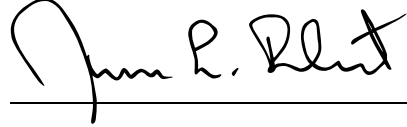
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23 I hereby attest that the concurrence in the filing of this document has been obtained
24 from each of the other signatories hereto.

25 Dated: 9/20/2019

26 By: /s/ Aravind Swaminathan

1 Good cause having been shown, IT IS HEREBY ORDERED that the parties may take
2 depositions through October 11, 2019.

3
4 Dated: September 23, 2019

A handwritten signature in black ink, appearing to read "James L. Robart", written over a horizontal line.

JAMES L. ROBART
United States District Judge